

1 James R. Condo (#005867)
2 Amanda C. Sheridan (#027360)
3 SNELL & WILMER L.L.P.
4 One Arizona Center
5 400 E. Van Buren, Suite 1900
Phoenix, AZ 85004-2204
Telephone: (602) 382-6000
jcondo@swlaw.com
asheridan@swlaw.com

6 Richard B. North, Jr. (admitted *pro hac vice*)
7 Georgia Bar No. 545599
Matthew B. Lerner (admitted *pro hac vice*)
8 Georgia Bar No. 446986
NELSON MULLINS RILEY & SCARBOROUGH LLP
9 Atlantic Station
201 17th Street, NW, Suite 1700
Atlanta, GA 30363
Telephone: (404) 322-6000
richard.north@nelsonmullins.com
matthew.lerner@nelsonmullins.com

10 *Attorneys for Defendants*
11 *C. R. Bard, Inc. and*
12 *Bard Peripheral Vascular, Inc.*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

16 IN RE: Bard IVC Filters Products Liability
17 Litigation,

No. 2:15-MD-02641-DGC

**DEFENDANTS' NOTICE OF
LODGING UNDER SEAL CERTAIN
EXHIBITS IN SUPPORT OF
BARD'S MOTION FOR SUMMARY
JUDGMENT AS TO PLAINTIFFS
DORIS AND ALFRED JONES'S
CLAIMS**

(Assigned to the Honorable David G. Campbell)

22 DORIS JONES and ALFRED JONES, a
married couple,

Plaintiffs,

V.

26 C. R. BARD, INC., a New Jersey
27 corporation and BARD PERIPHERAL
VASCULAR, INC., an Arizona
corporation,

Defendants.

1 Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (collectively
2 “Bard”), pursuant to the Stipulated Protective Order (Doc. 269) and Local Civil Rule 5.6,
3 file this Notice of Lodging Under Seal certain exhibits attached in support of Bard’s
4 Motion for Summary Judgment as to Plaintiffs Doris and Alfred Jones’s Claims. These
5 exhibits—as well as portions of Bard’s Separate Statement of Facts that quote, reference,
6 or characterize them (which Bard is lodging in redacted form)—contain Plaintiffs’
7 personal healthcare information that is protected under HIPAA and confidential under the
8 Stipulated Protective Order. Defendants have notified Plaintiffs of their intent to file this
9 Notice of Lodging. Because the documents lodged under seal and materials lodged
10 redacted only relate to Plaintiffs’ personal healthcare information, Defendants note that it
11 is Plaintiffs’ burden to file a motion to seal. A list of the exhibits lodged under seal, and a
12 list of materials lodged redacted, are attached hereto as Exhibit A.

RESPECTFULLY SUBMITTED this 28th day of August, 2017.

s/Richard B. North, Jr.
Richard B. North, Jr.
Georgia Bar No. 545599
Matthew B. Lerner
Georgia Bar No. 446986
NELSON MULLINS RILEY & SCARBOROUGH, LLP
Atlantic Station
201 17th Street, NW / Suite 1700
Atlanta, GA 30363
PH: (404) 322-6000
FX: (404) 322-6050
richard.north@nelsonmullins.com
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James R. Condo (#005867)
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SNELL & WILMER L.L.P.
One Arizona Center
400 E. Van Buren
Phoenix, AZ 85004-2204
PH: (602) 382-6000
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asheridan@swlaw.com

**Attorneys for Defendants C. R. Bard, Inc. and
Bard Peripheral Vascular, Inc.**

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of August 2017, the foregoing was electronically filed with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to all attorneys of record.

s/Richard B. North, Jr.
Richard B. North, Jr.

Nelson Mullins Riley & Scarborough

201 17th Street NW, Suite 1700
Arlington, GA 30363

